



# TOWN OF GREENWICH

Office of the First Selectman (203) 622-7710 fax: (203) 622-3793  
Town Hall • 101 Field Point Road • Greenwich, CT 06830  
E-Mail: [fred.camillo@greenwichct.org](mailto:fred.camillo@greenwichct.org)

Fred Camillo  
*First Selectman*

## **INDEPENDENT INVESTIGATION FINDS NO EVIDENCE OF DISCRIMINATION IN GREENWICH PUBLIC SCHOOLS' HIRING PRACTICES**

An independent investigation into the hiring practices at Greenwich Public Schools has concluded and the final report has determined there is no evidence of systematic discrimination on the basis of age, religion or political affiliation by the GPS during the period of 2017 to 2022.

The investigation was conducted by Day Pitney LLP. Day Pitney attorneys Stanley A. Twardy Jr., Jennifer M. Palmer and Taylor E. Anderson worked with consultants from Charles River Associates. Day Pitney investigated the hiring practices of GPS from 2017 to 2022 and Charles River Associates analyzed the hiring data during that time.

"The long-awaited independent report that I authorized is now out and I want to thank Stan Twardy and his team for their work on this issue," First Selectman Fred Camillo said. "It was an effort undertaken with the intent of finding out whether or not the incident in question was isolated or representative of a more systematic problem. I, like so many others, am relieved to see the findings did not uncover any widespread bias. The people of Greenwich deserve to know that their school system, like all other parts of Town government, is fair, impartial and effective in its missions. Let us move forward with this lesson in mind so that we may never have to request another investigation like this again in the future."

The Town hired Day Pitney LLP in December 2022 after a video was posted online by Project Veritas on Aug. 30, 2022. The video featured former Assistant Principal Jeremy Boland suggesting that he had engaged in discriminatory hiring practices while employed by GPS.

Mr. Boland subsequently resigned from his position with GPS.

The investigation determined that no one person could ever act alone to hire a new teacher or administrator for GPS and that there was no evidence of systematic discrimination such as the video alleged.

The scope of the investigation was exclusively on the hiring of teachers and administrators by the GPS to determine if there was any hiring discrimination on the basis of age, religion or political affiliation. Day Pitney reviewed GPS hiring practices and interviewed more than 40 teachers and administrators. Additionally, Charles River Associates analyzed a database for 11,231 applicants covering 732 hiring events between 2017 and 2022.

# **Report to the Town of Greenwich**

Stanley A. Twardy, Jr.  
Jennifer M. Palmer  
Taylor E. Anderson  
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 DAY PITNEY LLP

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## **I. INTRODUCTION**

### **A. Background and Drivers of Investigation**

On August 30, 2022, an organization known as Project Veritas released a video called “The Secret Curriculum: Part 1,” which it distributed by e-mail and posted on the internet, along with an accompanying press release. The video features comments by Jeremy Boland, a former assistant principal at Cos Cob School, which is one of eleven elementary schools in the Greenwich Public Schools (“GPS”) system. In the video, Mr. Boland makes statements suggesting that he engaged in discriminatory hiring practices while at GPS. Specifically, among other things, Mr. Boland suggests that he did not interview teacher candidates over the age of 30; that he attempted not to hire Roman Catholic candidates; and that he attempted to identify and not to hire candidates with a conservative political viewpoint.

The video circulated widely in Greenwich and elsewhere and was featured in local and national news media reports. Its release sparked widespread concern and public protests in the Town of Greenwich and in Connecticut more broadly. It also provoked several official inquiries related to Mr. Boland’s comments and hiring practices at GPS, including investigations by the Connecticut State Attorney General, the Connecticut Department of Education, the Connecticut Commission on Human Rights and Opportunities, and GPS itself. Some of these investigations are still ongoing as of the date of this Report.

In addition to these inquiries, the Town of Greenwich separately retained Day Pitney LLP (“Day Pitney”)<sup>1</sup> to conduct an independent investigation into the hiring practices of GPS. Specifically, the Town retained us to determine if the alleged discriminatory practices Mr. Boland described in the video were systematic, and if so, how pervasive, how wide and how deep.

### **B. Scope and Purpose of Investigation**

The scope of our work was limited to an investigation of whether available evidence suggests that hiring discrimination on the basis of age, religion, or political affiliation occurred in the GPS system, on a district-wide basis, during the period from 2017 to the present. In addition, although GPS employs individuals in a variety of different positions, we focused solely on teacher and administrator hires, since those roles tend to involve a more significant degree of interaction with students than other positions at GPS.

The purpose of our investigation was to make independent factual findings regarding the scope of our inquiry. This report sets forth the factual findings of our

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<sup>1</sup> [Stanley A. Twardy](#), [Jennifer M. Palmer](#), and [Taylor E. Anderson](#) conducted the investigation on behalf of Day Pitney. More information on their background and qualifications can be found on Day Pitney’s website, [www.daypitney.com](http://www.daypitney.com).

investigation. It does not include legal analysis, recommendations, or other privileged attorney-client communications, which are exempt from disclosure under the Connecticut Freedom of Information Act (“FOIA”). Conn. Gen. Stat. § 1-210(b)(10).

### **C. Summary Conclusion**

Our investigation did not uncover any evidence of systematic teacher or administrator hiring discrimination on the basis of age, religion, or political affiliation during the covered period. The numerous GPS employees with whom we spoke were uniform in their denial of any knowledge or suspicion of such discrimination, and many of them were able to articulate credible, non-discriminatory reasons for recommending particular candidates they interviewed for hire. In addition, our review of the hiring process at GPS indicates that hiring decisions were not made without the involvement of an interview committee, meaning that no single person acted alone in making a hire. The mandatory involvement of an interview committee for GPS teacher and administrator hires forms a meaningful structural impediment to systematic discrimination. Finally, in-depth data analysis of GPS employment records concerning the ages of teacher job applicants versus successful teacher candidates did not reveal patterns that suggest differences correlated with age.

## **II. INVESTIGATIVE PROCESS**

Apart from instructions as to the scope of our inquiry, our investigation proceeded on a fully independent basis, without direction from GPS personnel. None of the attorneys who worked on this investigation had personal ties to GPS or had previously performed work for GPS. GPS provided us with full access to its records and made available any GPS employees we wished to interview. In particular, GPS authorized us to access and review the complete set of job posting and application data it retained in the Frontline application system (formerly known as AppliTrack) from 2017 to the present.

### **A. Interviews**

Our investigation proceeded primarily through in-person interviews with GPS employees. From the outset, due to the large number of teachers and administrators employed across the district, we worked to identify an appropriate distribution and number of GPS employees to interview. We sought to interview an appropriate cross-section of employees in teacher and administrator roles, to identify and interview those employees most likely to have relevant information, to ensure that we spoke with more than one employee from each GPS school, and to elicit meaningful information from a variety of perspectives, without creating undue burden or wasting resources. To assist us with this effort, we retained Charles River Associates (“CRA”), a consulting firm with data analysis expertise and significant experience assisting clients and attorneys with assessment of discrimination claims.

GPS authorized CRA to extract and analyze all available data from the Frontline system from 2017 to the present. Among other things, the Frontline data included:

- GPS job postings for teacher and administrator positions.
- Names of applicants to each posting.
- Application files for applicants, including, for example, resumes, transcript(s), certifications, cover letters and letters of reference.
- “Recommendation to Hire” forms for successful GPS teacher job applicants, which typically include the names of teachers and administrators on the interview committee for that position, as well as the applicants interviewed for the position.

The Frontline data was, however, limited in certain respects. For instance, for any particular job posting, we were unable to determine whether the list of applicants to the posting was complete, since candidates maintain control over their applications even after a position is filled and may delete their applications from the system if they wish. Relatedly, in some instances, applicants may have submitted applications after the window for consideration for a position had closed, meaning that these applicants were not actually considered for employment. Despite such shortcomings, however, the Frontline data still provided us with a large amount of information regarding GPS job postings from 2017 to the present, applicants to those postings, and interviewers of applicants.

Working together, CRA and Day Pitney developed a list of GPS personnel to interview based on the Frontline hiring data. We chose interviewees based on the following criteria:

- Involvement with Particular Hires. We reviewed the Frontline data to target GPS teacher hires since 2017 where 25% or less of known applicants to the job posting were under 30 years old, but where the successful applicant was under 30. From this list of hires, we interviewed all current GPS employees who served on interview committees in connection with more than one such hire. Only eight current or former GPS employees met this criteria.
- Disproportionate Hiring of Younger Candidates. Among GPS employees who participated in teacher hire interview committees, with one exception,<sup>2</sup> we interviewed all current GPS employees who met the following criteria: (i) more than 50% of the time, the successful applicant for job postings in which the GPS employee was involved as an interviewer was 30 or younger, and (ii) the median age of successful applicants for job postings in which the GPS employee was involved as an interviewer was 30 or less. Twenty-four current or former GPS employees met these criteria.

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<sup>2</sup> One GPS employee selected for an interview under this criteria was unavailable due to health reasons. However, we do not believe that interviewing this employee would significantly affect the findings set forth in this report, particularly as we were able to interview multiple other employees with a similar role, who were from the same school as the unavailable employee.

- Additions to Ensure Appropriate Interview Distribution Across District. We supplemented the list generated by the first two categories above with additional GPS employees to ensure that we interviewed at least two GPS employees from each school in the district. In selecting these additional names, we prioritized GPS employees who had served on the greatest number of interview committees.
- Additions to Account for Administrator Hires. Many of the GPS employees we selected for interview had served on one or more interview committees for administrator positions as well as teacher positions, and therefore, they were able to speak to us about their experiences serving on both types of committees. However, in order to obtain information concerning the choice of a successful candidate for an administrator position, following an administrator interview committee's recommendation of top candidates for further consideration, we interviewed four additional GPS employees.

Altogether, we interviewed 42 GPS employees, including 18 teachers, 20 administrators, and 4 senior GPS employees based in the Havemeyer central office building.

Apart from interviews, several people we did not interview reached out to us directly and said they wished to speak with us about our investigation. We spoke by telephone with all such individuals, in lieu of a formal interview. When relevant, we took comments these individuals made into account during the course of our investigation.

## **B. Data Analysis**

In order to evaluate whether hiring discrimination occurred systematically at GPS over the past five years, and if so, to what extent, we concluded that we should not rely solely on our qualitative assessments of comments made by GPS employees during interviews and our selective review of employment records. Also critical to our investigation was the raw GPS hiring data, and what analysis of that data could show in terms of hiring trends and outcomes. In total, after extracting and compiling data from Frontline and cross-referencing it with employment records that GPS separately provided, CRA was able to analyze information associated with 11,231 applicants across 732 hiring events during the period from 2017 to 2022. CRA's analysis of GPS hiring data is therefore a valuable complement to Day Pitney's in-person interviews of GPS personnel and document review.

Together with CRA, we considered whether it would be feasible and cost justified to attempt to determine, based on the Frontline data, whether employment decisions at GPS over the past five years showed signs of potential differences in hiring rates that were correlated with age, religion, or political affiliation. With respect to age, we determined that data analysis would be both feasible and cost justified, since the Frontline data includes many indications regarding the ages of job applicants when considered for employment, and the ages of GPS employees at time of hire are available in GPS payroll records.

However, we determined that data analysis of religion and political affiliation would be more difficult to perform. Neither the Frontline data nor GPS employment records reveal the religion or political affiliation of job applicants or GPS employees. While we determined that some level of analysis could be feasible through the use of appropriate benchmarks and external resources (e.g., in the case of political affiliation, by cross-referencing job applicant and employee names with voter registration records), we concluded that this analysis would be less helpful than the age study, due to its necessary reliance on imperfect assumptions and benchmarks. We were also mindful of the fact that the need to gather, refine and analyze a significant amount of external data in addition to GPS's records would substantially increase the overall cost of our investigation. Further, we took into account Mr. Boland's suggestion that he considered age to be a proxy for religious affiliation and political affiliation (i.e., in his view, relatively younger candidates were less likely to be Roman Catholic or conservative). For these reasons, we concluded that data analysis of potential age-based hiring discrimination was appropriate, but that analysis of potential hiring discrimination based on religion or political affiliation was not justified.

A summary of CRA's analysis and conclusions with respect to potential differences in hiring rates correlated with age in the GPS hiring data is set forth below in Section IV.

### **III. INTERVIEW FINDINGS**

The discussion that follows is based on our interviews with GPS employees, as well as our review of documents that we requested and that GPS provided to us. The GPS employees we interviewed were generally consistent in their description of GPS hiring practices. However, to the extent possible and where necessary to resolve competing accounts, the discussion below includes our credibility determinations in our role as independent factfinders.

Our discussion includes a review of key aspects of the GPS hiring process, with particular focus on whether and how discrimination on the basis of age, religion, or political affiliation occurred or could have occurred during various stages of the hiring process. It is by no means, however, a comprehensive review of all of the steps involved in hiring a new teacher or administrator at GPS, which is beyond the scope of this investigation.

#### **A. Interviewee Profiles**

For each GPS employee we interviewed, we discussed or reviewed records regarding the individual's age at time of initial hire, and we also asked whether he or she had a religious or political affiliation. Their answers provided us with a sense of the profiles of our interviewees, which in turn sheds some amount of light on the profiles of GPS employees generally. Tables showing the breakdown of our interviewees' age at time of initial hire, religion, and political affiliation are set forth below.



## Age at Time of Initial Hire

Under 30	30 and Over
23	19

## Religion

Catholic	Episcopal	Other Christian	Jewish	Not Religious	Declined to Answer
23	3	5	2	8	1

## Political Affiliation

Democrat	Republican	Independent	Unaffiliated	Declined to Answer
14	8	5	14	1

We found it noteworthy that roughly 45% of our interviewees were over the age of 30 the first time they were hired into the GPS system, that the majority of our interviewees self-identified as Roman Catholic, and that the distribution of political affiliation was not concentrated into either a conservative or liberal category.

### B. GPS Hiring Practices

We discussed GPS hiring practices for teacher and administrator positions over the past five years with each of our interviewees. Due to the many similarities between the processes, we consider them together below, and our findings apply to both processes except where otherwise noted.

The process for hiring a new GPS teacher or administrator began when a need was identified, for example due to an increase or decrease in a particular student population, or due to a staff member's retirement, departure on leave, or transfer to a new position. The open position was posted on Frontline,<sup>3</sup> after which the GPS Human Resources Department ("HR") assigned an "administrative lead" to take charge of the interview process. For many administrator hires, the administrative lead was an HR

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<sup>3</sup> In many cases, if not all, open positions were also cross-posted on [www.ctreap.net](http://www.ctreap.net), an internet website for education-related jobs in Connecticut.

representative or a designee from the Superintendent's office. For teacher hires, or hires of elementary school assistant principals, the administrative lead was more likely to be the principal or another administrator at the school for which the position was advertised, or an administrator with particular responsibility in a specialized area.

## **1) Formation of Interview Committee**

The administrative lead's first job was to form a committee to interview and consider applicants to the position. In most cases, committees were relatively large and were composed with different stakeholders and constituents in mind. Interview committees for administrator positions typically consisted of between five and twelve people, including, aside from the lead administrator, other administrators; multiple teachers; a representative from the teachers' union, the Greenwich Education Association (the "GEA"); a representative from the administrators' union, the Greenwich Organization of School Administrators (the "GOSA"); one or more parent representatives; and in some cases, one or more student representatives.

Teacher interview committees were smaller, but still sizeable, typically consisting of between three and six people, with the composition of the committee varying according to the position. In general, teacher interview committees included the lead administrator; one or more teachers, either in a similar or related position to the posted vacancy, or in a different position, but in the same school; a GEA representative, which could be one of the aforementioned teachers; and possibly an additional administrator.

A key exception to the general GPS practice regarding composition of interview committees related to long-term substitute ("LTS") positions. Interview committees for LTS positions were often smaller, sometimes consisting of only two people (e.g., a principal and assistant principal). This difference in size sometimes appeared to have been driven more by necessity than by design. In many such LTS hires we reviewed, the position became available on short notice during the school year, when a staff member unexpectedly went out on leave or a temporary replacement was otherwise needed on an urgent basis. We saw multiple such instances during the summer and fall of 2020, for example, during the peak of the Covid-19 pandemic. However, in order for a candidate selected for an LTS position to continue on as a GPS employee in a permanent role, the candidate was required to re-interview with a new interview committee if and when a permanent position became available. In contrast to LTS positions, most of the records we saw concerning interview committees for full-time teacher positions indicated that they consisted of between three and six people.

## **2) Screening**

Screening of candidates was often necessary before an interview committee could begin its work. In some instances, lead administrators reported having handled screening for teacher positions by themselves, but in other instances, the lead administrator worked with one or more other administrators to review applications and develop a list of candidates to interview. Teachers were typically not involved in screening job applicants, absent special circumstances.

Those who screened candidates reported having reviewed, as a primary consideration, whether a candidate met the minimum qualifications for the positions advertised. Many times, for instance, applicants would not have the appropriate certification for the job. Screeners also considered the prior relevant experience of candidates, though several individuals reported to us that they would not automatically exclude a candidate who had relatively little experience, but was otherwise qualified. Some reported considering whether candidates had work experience that might demonstrate leadership qualities.

For teaching jobs, screening typically proceeded based on paper applications, including a review of application forms, cover letters, resumes and letters of recommendation. In instances where a large number of qualified candidates applied for a position, the lead administrator might have preliminary phone calls or videoconferences with candidates in order to determine whom to invite for an interview. In other instances, the number of qualified candidates was small enough that no further screening was necessary, and all qualified candidates were invited to interview.

For administrator jobs, screening was typically performed by the Superintendent working together with other senior-level GPS staff. When the applicant pool was large, screening proceeded in two stages: first with a paper review of applications to identify promising, qualified candidates; and second, with brief virtual, telephonic or in-person screening interviews with the identified candidates, as well as all “internal” candidates (i.e., applicants who were currently employed in full-time GPS positions). Of those invited to a screening interview, roughly 5-8 candidates would ultimately be invited to a committee interview.

We asked all interviewees who reported having screened candidates whether they ever considered the age, religion, or political affiliation of candidates during the screening process. No interviewees reported having considered these factors at the screening stage. More than one interviewee noted that experience level, which can be related to age, is a factor they considered while screening candidates. However, to the extent this factor impacted screening decisions, the impact tends to favor relatively older candidates over younger candidates, contrary to the allegations driving this investigation.

### **3) Interviews**

Once the lead administrator had determined a slate of candidates to interview, the next task would be to develop a set of questions for the interview. Lead administrators told us that they obtained model interview questions from HR or from fellow administrators who had previously taken the lead on similar hiring processes. Day Pitney requested and reviewed multiple examples of these lists of questions, which generally consisted of between six and ten questions total. The sample questions we reviewed, and the interview questions described to us by GPS personnel, were not discriminatory in nature. To maintain the confidentiality of the questions and to avoid limiting their usefulness in future hiring processes, we have not attached sample question lists to this report.

On or just before the day of the interviews (or the first interview day, in the less frequent instances when interviews spanned multiple days), the lead administrator would provide each member of the interview committee with the list of questions, along with an application package for each applicant, which included a resume and other written materials pertaining to each candidate. Sometimes, the interview committee would discuss the list of questions and decide whether any refinement of particular questions was appropriate. The committee would also decide which interviewer would ask which question(s). Each interviewer would then ask the same question(s) of each candidate during each interview. Interviewers generally did not deviate from the list of pre-authorized questions during interviews. Almost all of our interviewees reported either that they did not ask follow-up questions to pre-authorized questions; or that if they asked any follow-up questions, they asked the same follow-up questions of all subsequent candidates; or that follow-up questions they asked were limited to requests for clarification of an answer, such as an explanation of an acronym used. In contrast, one interviewee reported use of follow-up questions to “shine a brighter light” on a candidate, and another said that she had asked follow-up questions when a candidate said something that “rang a bell” in her head.

We asked each person with whom we spoke whether they considered or asked any questions about age, religion, or political affiliation during the interviews, or whether there was any discussion of these factors during interviews. Each of our interviewees reported that these factors were not considered or discussed. Several people we spoke with expressed the view that they would not have been able to ascertain a candidate’s religion or political affiliation from the application materials they reviewed, had they attempted to do so.

Following interviews, where warranted and possible, for teacher positions, and depending on the nature of the position, the interview committee might choose to invite a subset of those interviewed to conduct a demo lesson. We heard that it was harder to conduct demo lessons over the summer, when school was not in session, but that when the interview committee considered demo lessons to be important, committee members would sometimes reach out to GPS families and ask for student volunteers to make summer demo lessons possible.

#### **4) Deliberations**

Interview committee deliberations proceeded in several stages. Multiple individuals reported to us that the committee would briefly discuss each candidate after his or her interview, before the next interviewee was invited in. After all interviews were complete, the interview committee would remain together to discuss the different candidates. These discussions typically focused on identification and comparison of the various strengths and weaknesses of different candidates. Depending on the preference of the lead administrator, the deliberations might involve a numerical ranking component, or they might be purely qualitative in nature. For teacher hires, if the interview committee decided to invite a subset of candidates to conduct demo lessons, further committee deliberations would follow the demo lessons.

With respect to teacher hires, those we interviewed consistently reported that they were able to achieve consensus on a first-choice candidate, with a rare exception being a recommendation of more than one candidate (sometimes on a first-choice and second-choice basis), or a conclusion that none of the candidates interviewed were appropriate for the position. After agreement on a candidate or candidates to recommend, the lead administrator would conduct or supervise reference checks, after which the lead administrator or a designee would complete an online “Recommendation to Hire” (“RTH”) form in the Frontline system to document the interview process and its outcome. GPS personnel consistently reported to us that they understood that HR retained ultimate discretion on whether to hire a recommended teacher candidate. Whether a recommended candidate ultimately assumed a teaching position depended, among other things, on the outcome of the employment verification and background check process, and whether the candidate accepted the job offer.

With respect to administrator hires, those we interviewed consistently reported that they were able to achieve consensus on the top two or three candidates to recommend for further consideration. After identification of these candidates, the lead administrator for the process would relay the committee’s findings to the Superintendent, who would then undertake his or her own review of the candidates. Depending on the circumstances, this level of review could involve a final round of interviews with the Superintendent and other senior GPS staff, as well as reference and other background checks. The Superintendent retained ultimate discretion over whether to hire any candidate recommended by an interview committee for an administrator position, and those with whom we spoke consistently reported that they were aware that the Superintendent or GPS leadership (sometimes characterized as “Cabinet,” “Central Office” or “Havemeyer”) retained this discretion. In some instances, we heard that the Superintendent exercised discretion not to retain any of the candidates recommended by an administrator interview committee. However, we heard nothing to indicate that any of these exercises of discretion involved discrimination based on age, religion, or political affiliation.

We asked each person we spoke with whether age, religion, or political affiliation was considered at any point during any of the post-interview deliberations. They reported that none of these factors were discussed or appeared to them to play a role during committee deliberations. We note, however, that two people with whom we spoke told us that during a small number of interview processes with which those individuals were familiar, particular interviewers had made comments that could be construed to favor younger candidates over older candidates, for instance by commenting on whether a particular candidate was likely to have a relatively long or short tenure with GPS. Both individuals told us that in these instances, they discussed with the persons who made the comments the importance of refraining from age discrimination or any appearance of age discrimination in hiring at GPS, and in at least one case, a person who made such comments received bias and sensitivity training as a result.

In contrast, many of those with whom we spoke had specific, credible recollections as to why a particular candidate was recommended for hire, including the following:

- “You could tell [she] lived the instructional practices that she was talking through. She was passionate about being with kids. She had solid experiences to work off of. You could feel her confidence in how she spoke.”
- “She won us over with a particular comment: ‘I know I’m a really good teacher, but I know I have to get much better.’ It speaks to her growth mindset.”
- “She stood out because she was the most informed in next gen science standards. And we liked how she talked about teaching the whole child.”
- “He had interesting answers when I asked, what are you reading. And he had been a lead RA-type [college residential advisor] person. That requires a lot of common sense in practical scenarios. I was impressed by that experience in addition to his degree and his resume.”
- “We didn’t all agree after the interviews, but after the demo lesson it was easy. We were in hybrid, so some were in class virtually and some in person, and she was making sure to connect with both. She really managed to have energy in the room. This brand new teacher was able to roll in and run a lesson that looked like that – it was amazing.”
- “[She] spoke very eloquently and knowledgeably about pedagogy, reading and math. She was stellar in her interview. The entire committee said she was our top pick.”
- “[She] was a dynamo in her interview. She presented very, very well. The way she presents, her enthusiasm, the way her face lights up when she talks about children. She didn’t have tons of experience, but the examples she came up with were really well developed, on point, detailed.”
- “She was highly organized, very data-driven. For that role, you know you want to make data-driven decisions toward socio-emotional or counseling goals. She had a binder of resources and data as well as presentations prepared. She presented as very organized, thorough and knowledgeable. She’s been a rock star.”
- “She was jump-off-the-page enthusiastic. She had the combination of being very professional and knowing your stuff.”
- “She had experience teaching reader’s workshop in college. The other person we liked did not. And we liked her approach to handling certain behavioral problems.”

## **5) Training Related to Hiring**

In general, only GPS administrators received training on hiring practices during the period we reviewed. In lieu of formal training, teachers who participated in

interview committees generally received oral instructions regarding interview and deliberation procedures at the outset of each interview process.

On key points, GPS administrators reported consistency in training over the period since 2017. For instance, they reported having consistently been instructed to decide upon appropriate interview questions in advance, and not to deviate from the pre-authorized questions during interviews. Many of the GPS administrators with whom we spoke, however, reported that GPS hiring policies were inconsistent in other respects over the same period. For instance, depending on the time frame and the current HR director, administrators recalled being instructed to destroy all notes and other written materials pertaining to a hiring process. Conversely, at other times, they recalled being instructed to preserve all written materials, or alternatively, to preserve, collect and send all written materials to the HR Department.

A few of the administrators with whom we spoke recalled a presentation on GPS hiring procedures shared at some point during the 2020-2021 school year, which is attached as Exhibit A to this report. The presentation appears to focus on teacher hiring and describes GPS hiring procedures in a manner that is generally consistent with the practices described to us during our interviews. It stresses the importance that interview committees represent “a diverse group of members” in order to “avoid[] bias and interviewing just ‘someone you know,’” and suggests that 4-6 committee members is an appropriate number for an interview committee.

Several administrators praised the efforts of the current Chief Human Resources Officer to maintain regular contact with administrators and to implement consistent procedures and best practices for hiring across the district. They referred to multiple communications from him over the past year, including a more recent presentation on teacher hiring practices, dated as of September 21, 2022, which is attached as Exhibit B to this report. In addition, GPS provided us with a summary memorandum on hiring practices dated July 3, 2023, which was distributed to administrators in advance of the 2023-2024 school year, and which is attached as Exhibit C to this report. Among other things, the July 2023 memorandum formalizes in writing various hiring policies our interviewees described to us, such as securing representative membership on interview committees and finalizing interview questions in advance. It also states that interview committees will begin their work “in focused discussion of principles for non-discriminative, equitable hiring” and instructs lead administrators to set aside 45 minutes for this purpose. Together, these memoranda corroborate what we heard firsthand from those we interviewed, namely that over the past year, GPS has engaged in a concerted effort to update and implement best practices in hiring and make sure its administrators are well informed regarding those practices.

### **C. Interviewee Comments Regarding Potential Discrimination**

As discussed above, we asked each person with whom we spoke whether age, religion, or political affiliation was considered at any point during any of the hiring processes in which that person was involved. None of the individuals we interviewed

reported ever having considered, or having felt that someone else was considering, these factors at any point during the hiring process. To the contrary, they made comments like the following:

- “There’s never been any discussion of age, politics or religion.”
- “The committees I’ve been on, there haven’t been issues with religion, political bias, age.”
- “There’s no exclusion based on age. I wouldn’t know political affiliation. Same for religion – there’s no way of knowing.”
- “Most of us think that it’s best if there’s diversity of age. But it’s not really a factor. I can’t tell religious preference. That’s never come up. And I think it’s healthy to have a mix of politics.”
- “Multiple people have gotten jobs who are relatively right out of school, and I’ve also had some seasoned veterans hired even in the past year because they had great experience.”
- “I don’t even know the religion of a lot of the people in my building.”
- “On all the committees I’ve been on, there’s been nothing less than professionalism.”

We also asked those we interviewed what their reaction was when they first learned about Mr. Boland’s comments on the Project Veritas video. They consistently reported surprise or shock. Many also recalled feeling anger or disgust, and they characterized the comments as “baseless,” “bizarre,” “ridiculous,” “stupid,” “weird,” “terrible,” “horrible,” “disturbing,” “very upsetting,” “outrageous,” or even “despicable.”

Some interviewees reported feeling “furious” or “sick to my stomach” upon hearing the comments. One said the video “makes us all look bad, which is so unfair.” Another person commented, “We are all hard workers. We follow appropriate processes. To have someone talk like that, and think that the public would think this is representative of GPS, it’s very upsetting.”

Many expressed disbelief of Mr. Boland’s statements. For instance, we heard the following:

- “I’ve never heard anybody in Greenwich saying those types of things.”
- “I wasn’t like, oh yeah, he’s saying what we all think. I was just like, where is this coming from? I’ve never experienced anything like that.”
- “There’s no way that he was doing that. There’s no way.”
- “That’s not how Greenwich operates.”
- “Nobody believes that’s what you should be doing.”
- “I don’t believe [what he said]; I don’t know anyone who does, and I wouldn’t work here if I did.”
- “Everyone says, how could he say that?”
- “How would he know religion, unless he asked?”
- “How would we even know this information?”



- “It didn’t make any sense.”
- “None of us feel what was portrayed in that video. I’ve never heard anyone talk about those biases before.”
- “I don’t believe that’s a fair representation of GPS administrators.”
- “There’s lots of stuff that could be said about Greenwich. This was not something that was an unspoken, known thing. This was an unknown thing.”
- “What was portrayed on the video was not my reality.”

Many told us that Mr. Boland’s comments couldn’t be reconciled with actual GPS hiring practices. They pointed out that hiring decisions involve committees, and they are not made by individuals acting alone. They also said their personal experiences differed from Mr. Boland’s comments. For instance, we heard the following:

- “Procedurally, Jeremy’s comments made no sense.”
- “We don’t have that type of authority, one person can’t do that. These are group decisions.”
- “You’re never alone, never a committee of one, even if it’s an emergency, you at least have someone in the room with you.”
- “My first reaction was, oh please, you don’t have that much power.”
- “No one has the power to sway the group that way. If you tried to push those three things, other people would be on you.”
- “We all knew there was no way you could do what he was saying.”
- “Could assistant principals make decisions by themselves? Not for the principals I worked for. Not ever.”
- “I’ve never made a hiring decision by myself as an assistant principal.”
- “Fundamentally, I know that the processes I’ve been involved in are quite different than what was represented.”
- “From my lens, it wasn’t accurate. I know the process is respected and followed. I’ve never heard of a hiring decision being made by one person.”
- “It seemed to me like he was embellishing his abilities. He’s not able to make those decisions on his own.”
- “I can’t think of any time where someone skipped the process.”
- “I know it is not just one person who makes those decisions. And I know that I’m the religion and the age bracket of those he was describing.”

Several of those we spoke with expressed empathy for Mr. Boland. Multiple individuals expressed the view that he had been “set up” or “duped” and that the video featuring his comments had been filmed without his knowledge and later edited. Some concluded that he made his comments in an effort to impress someone, and thought he might not actually have believed his comments himself.

In summary, those with whom we spoke did not report having observed or suspected discrimination on the basis of age, religion, or political affiliation during the

GPS hiring process since 2017, and they also expressed the view that Mr. Boland's comments in the Project Veritas video were not true.

#### **D. Outliers and Inconsistencies**

Descriptions of the GPS hiring process for teachers and administrators were fundamentally consistent across the interviews we conducted and the documents we reviewed. Nevertheless, we encountered a few outliers and inconsistencies.

For instance, during one of our interviews, we learned that of the many RTH forms we reviewed, one was misleading in a material fashion. This RTH form suggested that an interview committee of two people, consisting of a principal and a teacher, had interviewed four candidates for a permanent GPS position, and that the principal had ultimately recommended one of the candidates for hire on the basis of those interviews. Upon speaking with the teacher listed on the RTH form, however, we learned that the teacher's involvement in this process was limited to a single one-on-one phone call with the successful candidate, which was not part of a formal interview and did not involve pre-authorized interview questions; rather, the call was conversational in nature. The teacher reported that she did not interview or call the other candidates listed on the form. In fact, the teacher was surprised to find herself speaking with us, since in her view, she had never participated in any interview committees and could not offer any perspective on the GPS hiring process.

We were unable to determine whether this RTH form reflected an actual deviation from GPS's interview committee policy, or whether it was simply incomplete and erroneously failed to list other interviewers who were on the committee. Regardless, while this incident appeared to be an outlier, we investigated further to make sure it was not indicative of a larger issue. We reviewed all of the other RTH forms signed by this principal since 2017 to ascertain whether other hiring processes led by this individual might have proceeded similarly.<sup>4</sup> None of the other RTH forms reflected committees consisting solely of the principal and another teacher. While there were a relatively large number of RTH forms (13) reflecting a committee of two, in those instances, the committee of two was the principal and an assistant principal. We interviewed the assistant principal in question, and we did not hear comments that suggested to us that the principal otherwise acted alone in making hiring decisions. This assistant principal also thought there were more individuals on at least some of the interview committees than the two noted on the RTH forms. Further, although the misleading RTH form related to a permanent position, the majority of the other RTH forms reflecting a committee of two related to LTS positions.

We also saw multiple instances of RTH forms being filled out inconsistently, incompletely, or otherwise inaccurately. For instance, while most RTH forms listed the

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<sup>4</sup> We did not interview the principal who signed this RTH form, as the individual is no longer a GPS employee.

names of the candidates interviewed and the individuals on the interview committee, a considerable number of RTH forms only listed numbers and not names, with the result being that the identity of the candidates interviewed (and sometimes the identity of the members of the interview committee) was not recorded or preserved in connection with those hires. In addition, some individuals we spoke to recalled having interviewed other or different candidates from those listed on a particular RTH form. However, because it is common for GPS personnel to transfer to new positions within GPS, going through the interview process and typically generating a new RTH form with each transfer, it is also possible that those we spoke with were recalling a different interview process from the one reflected on the particular RTH form under discussion. Interviewees also pointed out other types of mistakes on certain RTH forms, such as a notation of the wrong last name for a candidate interviewed. A few interviewees told us that not all of the members they recalled being on a particular interview committee were listed on the RTH form for that committee.

Another inconsistency we observed relates to record retention, as noted above. Beginning before 2017, GPS's policy was to shred and discard notes and other written materials related to job interviews after the conclusion of interview committee deliberations. This practice was maintained through 2022, at which time the current Chief Human Resources Officer instituted a new practice of systematically collecting and retaining all written materials relating to interview processes after an interview committee concluded its work.

One of our interviewees shared her concerns that, at least in certain instances of which she was aware, lead administrators had run interview processes in a manner that unfairly favored or disfavored certain candidates. However, this interviewee also told us that she did not believe any discrimination on the basis of age, religion, or politics had occurred during these instances.

Finally, a former employee contacted us to report certain concerns about hiring practices at GPS. While most of the concerns she expressed were beyond the scope of our inquiry, the former employee also told us that she had filed a complaint of age discrimination with the Connecticut Commission on Human Rights and Opportunities regarding her own employment history with GPS, and that in addition, she believed age discrimination had occurred in connection with a particular GPS hire in which she was involved. While a thorough review of the circumstances surrounding particular hires would be beyond the scope of our investigation, we nevertheless reviewed her concerns, which included a review of the RTH form that appeared to correspond to the other hire at issue and an interview of another individual who participated in the interview committee for that hire. Nothing in our review suggested to us that the former employee's concerns or the particular hiring process she highlighted were indicative of a pattern of age discrimination along the lines described by Mr. Boland.

#### **IV. DATA ANALYSIS REGARDING POTENTIAL DIFFERENCES IN HIRING RATES CORRELATED WITH AGE**

Our investigation also involved review and analysis of data pertaining to GPS hiring records for the period from 2017 to 2022. As described above, working with CRA, we determined that it would be helpful and cost-justified to analyze available GPS data in order to determine whether statistical evidence might exist to shed light on whether any significant differences in hiring rates by age occurred in a measurable way during that period.

In CRA's report, which is attached hereto as Exhibit D, CRA explains how it prepared an analytic database containing information concerning 11,231 applicants and 732 hiring events. Using that database, CRA tested whether there were any statistically significant patterns of under- or over-hiring of individuals over age 30 across job postings from 2017 to 2022. They found that during that period, just over nine *more* individuals over age 30 were hired than would have been expected given their representation in the applicant pools. CRA also concluded that this small disparity was not statistically significant, meaning that it could have occurred by chance. CRA further found no statistically significant differences in the hiring rates of individuals over age 30 at different school levels (i.e., elementary, middle, and high school), nor did CRA identify any trends over time toward under- or over-hiring of individuals over age 30 during the period. In sum, CRA's analytical results were consistent with a hiring process that is neutral with respect to age. Further detail and an explanation of the analytical methods CRA employed for its analysis, which are commonly used in court and regulatory proceedings involving claims of age discrimination, are set forth in CRA's report attached as Exhibit D.

#### **V. CONCLUSION**

Our investigation did not uncover any evidence of systematic discrimination on the basis of age, religion or political affiliation at GPS during the period from 2017 to the present. Our confidence in this finding is reinforced by underlying conclusions in three key areas: (i) comments we heard during our interviews; (ii) the nature of GPS's hiring process; and (iii) CRA's data analysis of potential age differences in hiring rates.

With respect to interviews, we did not hear from any of the many individuals with whom we spoke that they believed or suspected discrimination on the basis of age, religion, or political affiliation had systematically occurred at GPS. To the contrary, many rejected this possibility outright. None of our interviewees told us they heard comments about age, religion or politics being made during their participation in hiring processes, or that they suspected that others might have been weighing those factors during those processes. Further, when we spoke about particular hires for which an individual had served on the interview committee, many times the individual was able to credibly recall and articulate a non-discriminatory rationale as to why the committee recommended a particular candidate for hire.

With respect to GPS's hiring process, the committee-based nature of the process was a persistent theme in our interviews, along with universal agreement that while a final hiring decision rests with HR and/or the Superintendent, no one person could ever act alone to hire a new teacher or administrator at GPS. At the screening level, multiple administrators often work together to select candidates to move forward to either a screening or committee interview, though sometimes a single administrator selects teacher candidates for committee interviews. At the interview level, with one possible exception noted above (which is inconsistent with GPS policy), we saw no evidence of hires that did not include an interview committee as a key part of the process. The involvement of multiple people at multiple levels in the GPS hiring process significantly curtails the potential for systematic discrimination on the bases we investigated. The fact that interview committees composed of diverse stakeholders are a central feature of every teacher and administrator hire at GPS is noteworthy and speaks to the high level of community interest and involvement in school hiring in Greenwich.

Finally, with respect to CRA's analysis of GPS hiring data, CRA undertook a thorough review of data concerning 11,231 applicants and 732 hiring events. Employing analytical methods that are widely used in court and regulatory proceedings concerning age discrimination claims, CRA concluded that there were no statistically significant differences in the hiring rates of individuals over age 30 versus individuals under age 30 during the period from 2017 to 2022. This result is consistent with an age-neutral hiring process.

We would also like to emphasize that GPS has made a concerted effort to standardize and implement consistent hiring procedures and best practices over the past year. As noted, the HR department has engaged in more frequent contact with administrators about hiring, and GPS has delivered more substantive written training materials and provided more in-person or virtual training at the outset of hiring processes. This increased level of oversight, transparency and communication is a further protection against potential future discrimination in GPS hiring.

\* \* \*

We appreciate the cooperation and support that we received from GPS and from the teachers, administrators and other personnel with whom we spoke. We hope that this report will be of value to them, to the school system, and to the greater Town of Greenwich community.

As stated at the outset, this report is limited to the factual findings of our independent investigation, the scope of which was limited to potential discrimination on the bases of age, religion, or political affiliation in the Greenwich Public Schools since 2017. With the submission of this report, our independent investigation has come to a close.

# EXHIBIT A

# The Hiring Process

**Process, Interview, Post Interview**

# The Process

- Post/Recruit candidates
- Determine Committee Members
- Prescreen candidates in Applitrack, and with pre-screening interviews when appropriate
- Interview candidates (internal/external candidates)
- Conduct Demo Lessons when appropriate (GEA)
- Second Interview (GOSA)
- Determine final candidate
- Reference check and submit Recommendation for Hire to HR



# Steps for Filling Vacancies

- Notify HR of the vacancy (Marilyn Addleberg)
- Provide HR with job description/Review of existing job description
- Confirm the timeline for posting (dates/times) \*typically 2 week posting
- Review and select applicants (internal/external) **once the posting closes**

# Internal Candidates

- Tenured employees in GPS
- Candidates can announce their intent to HR in January and apply for internal vacancies once they are open
- Substitute teachers (Long Term Subs) are not considered internal candidates
- Paraprofessionals are not considered internal candidates when applying for teaching positions
- GEA and GOSA members are considered internal candidates
- The Hiring Chair must always communicate with internal candidates if they are moving forward or not.
- Interviews should be conducted, and demo lessons considered when needed

# HR Paperwork

A completed file includes the following:

- Application (completed and submitted)
- Resume
- Transcript (s)
- Certification
- Letter of interest
- Letters of recommendation

*The recommendation for hire should be submitted after the interview chair confirms the file is completed and references have been checked. Please contact Marilyn Adelberg (HR) with any questions.*

# The Interview Committee

The interview committee should represent a diverse group of members as much as you possibly can. This will ensure that a diverse perspective is considered with careful consideration, avoiding bias and interviewing just “someone you know”

Committee members should include:

- The chair (principal, or district coordinator)
- GEA representative
- Teacher from grade level/discipline
- Diversity Committee member/individual with this focus
- Committee should not exceed a team of 6

# Roles & Responsibilities of the Committee Members

- Determine the attributes, skills, content knowledge and diverse perspectives needed
- Interview Chair/ HR screen applicants
- Committee will meet to review questions, understand the process
- Committee recommends the candidate for hire
- Committee members should never discuss the candidates with anyone outside of the committee.

# Questions for the candidates

It is important to remember that you are hiring for the district. Questions should help the committee understand the candidates experience and knowledge of the content, social emotional learning, diversity, equity and inclusion.

## **Sample Questions:**

[https://docs.google.com/document/d/1EsJSdiAWow\\_yZJFMUCwvoJGOzVCeISnPyI7sEwboz7s/edit](https://docs.google.com/document/d/1EsJSdiAWow_yZJFMUCwvoJGOzVCeISnPyI7sEwboz7s/edit)

## Demo Lessons

When time permits, a demo lesson is recommended. Ideally at least two members of the committee should be present to observe the candidate.

Determine look fors (ex. Interaction with students, introduction, delivery, assessment of student knowledge)

Reconvene the committee to share observation feedback and make the final recommendation

Follow the process regarding next steps for recommendation to hire.  
Communicate regrets with unsuccessful candidate.

# Increase Diversity Recruitment Efforts

The state of CT Department of Education has charged every district to increase efforts in addressing this concern. You can assist by following the steps outlined, and be intentional about increasing the diversity in your school environment. Contact the HR department with any questions.

## **Resources:**

GPS Recruitment Video (Please share): [https://www.youtube.com/watch?v=t\\_8R2ClgwLE&t=13s](https://www.youtube.com/watch?v=t_8R2ClgwLE&t=13s)

[https://portal.ct.gov/SDE/Talent\\_Office/Workforce-Diversity/Documents](https://portal.ct.gov/SDE/Talent_Office/Workforce-Diversity/Documents)

<https://ctmirror.org/2020/10/07/number-of-educators-of-color-increase-in-ct-k-12-schools/>



# EXHIBIT B

# Review of Human Resources Procedures: Hiring Teachers



Greenwich Public Schools Leadership  
September 21, 2022

Jonathan S. Budd, Ph.D., Chief Human Resources Officer  
David Eisenstein, Director of Human Resources

## This Session's Goal:

To review the phases of hiring teachers in GPS

## Six Phases of the Process

1. Determining & posting the vacancy
2. Screening of applications
3. Interviewing
4. Demonstration lessons [recommended, not required]
5. Reference checks
6. Review, approval, & potential hire by Human Resources

## Determining & Posting the Vacancy

- Numbers of certified positions must align with the TOO and with GEA
- Long-term substitute = another individual has a permanent position, but is on leave or special assignment
- Minimum qualifications for vacant positions are determined in concert with the CHRO and posted; almost always, this relates to certification (or certifiability)
- Administrative lead is to be established (often building principal); the responsibility is to *lead* the process, ensuring compliance with all standards
- Applicant materials are confidential

# Screening of Applications

- Value of more than one individual doing this independently, then coming together to discuss
- Screening should be done of submitted & completed applications
- Screening should be against qualifications for the position
- Paper screening can be complemented by Google Meet screening; materials should be retained

# Interviewing

- Committee should be representative
- Committee members should not be vested for or against any particular applicant(s)
- Committee must have consistent membership
- Committee must consider two things: (1) the information presented in the application materials; and (2) the answers given to the same interview questions
- Questions should be approved and linked to qualifications for the position
- Committee discusses and gives advisory input against an approved rating sheet/scale
- Materials should be retained

## Demonstration Lessons

- Context and details should be reviewed with HR in advance
- Reviewers should not be vested for or against any particular applicant(s)
- Materials should be retained



# Reference Checks

- Should utilize forms in Frontline, and be done by administrative lead
- Are required by good practice
- Are required by BOE policy (based on CT statute):
  - “Prior to offering employment to an applicant, the Board shall make a documented good faith effort to contact each current and any former employer that was a Board of Education, council or operator or if such employment otherwise caused the applicant to have contact with children of the applicant in order to obtain information and recommendations which may be relevant to the applicant’s fitness for employment, provided such effort shall not be construed to require more than three telephone requests made on three separate days.”

# Review, Approval, & Potential Hire by Human Resources

- Requires CHRO review of the process used, in conversation with the administrative lead
- Requires CHRO review of certification (or certifiability) and transcripts, along with in-person meeting
- Hire requires signing of salary agreement, and is contingent upon:
  - successful completion of all new hire employment forms provided;
  - verification of employment;
  - satisfactory confirmed background records checks.
- All materials should be sent to HR by the administrative lead

# EXHIBIT C



## Department of Human Resources

**Jonathan S. Budd, Ph.D.**  
Chief Human Resources Officer

Tel: (203) 625-7405 Fax: (203) 625-7408  
jonathan\_budd@greenwich.k12.ct.us

### MEMORANDUM

TO: All Greenwich Public Schools Administrators

FROM: Jonathan S. Budd, Ph.D.

DATE: July 3, 2023

RE: Key Reminders on Teacher Hiring Processes

With the turn of a new school year, please read carefully the following key reminders on teacher hiring processes. The overarching goal of a hiring process is to select the best candidate at the conclusion of a fair, defensible process. The best outcome cannot happen outside of the best process.

#### I. The Administrative Lead & General Principles

- Assigned by the Chief Human Resources Officer when the position is posted on Frontline, the administrative lead will lead the teacher hiring process, including communicating questions, concerns, etc. with the CHRO.
- Please remember that, ultimately, individuals are hired only by Greenwich Public Schools, meaning the Human Resources Department and not any individual site or administrator. Please be cautious of any conversation with an applicant that might lead the person to believe that he/she is being hired prior to a final HR interview and potential contract discussion/signing.
- Please remember that our process on Frontline should serve to capture all information relevant to the hiring process. Applicants who contact you outside that process should be redirected to place relevant information on Frontline. Individuals who contact you on behalf of an applicant should be redirected to the applicant, who can choose whether to submit additional relevant material.
- If an applicant withdraws from the process once it has begun (e.g., by declining an interview that is offered), please objectively note that in the "Notes" section of Frontline next to the individual's name and application so that we have preserved that information.

#### II. Screening of Applications

- A position must post for two full weeks prior to candidates being selected to be interviewed. Exceptions may be approved only by the CHRO in documented extenuating circumstances.
- Only candidates who have "Submitted" via Frontline should be screened.
- All candidates who have "Submitted" via Frontline should be screened.

- p. 1 of 3 -

- Internal candidates must be interviewed<sup>1</sup>. “Internal,” for this purpose, means that a candidate is contracted for a benefits-eligible position in Greenwich Public Schools (e.g., teacher, administrator, professional assistant). If you have questions on whether someone falls into this category, please reach out to the CHRO.
- External candidates should be screened based on job-related criteria associated with the posted job description (for example, selecting candidates with documented experience with inquiry-based science). Screening the applications is not restricted to the administrative lead, and a good practice is to involve others in this process (e.g., having an Assistant Principal and Principal screen independently, then meet to reach consensus).
- Remember that applicants must meet all posted minimum requirements in order to proceed to the interview phase. If you have a question about a candidate’s certifiability, please contact the CHRO.

### **III. Assembling the Interview Committee**

- Committee membership must include a representative of the GEA. Please contact Lill Perone, President, for her identification of who this person will be.
- Committee membership should be representative, and should allow a variety of voices to contribute to the process.
- Committee members must be able to attend in person, and must be able to attend the entire scope of interviews. Exceptions may be approved only by the CHRO in documented extenuating circumstances.
- Someone who has written a letter of reference for a candidate to be interviewed cannot serve on the interview committee unless that individual is in a role that by its nature must be on the committee (e.g., the school principal).
- Participation on an interview committee shows commitment to GPS and the larger teaching profession; thus, GPS does not compensate committee members through payment.

### **IV. Conducting the Interviews**

- The committee will begin by engaging with the CHRO in focused discussion of principles for non-discriminative, equitable hiring. Please leave 45 minutes prior to the arrival of the first interviewee.
- Questions for the interviews should be shared and discussed with the CHRO prior to the day of the committee interview. Questions will be reviewed for clarity, non-discrimination, and equity across GPS hiring committees.
- Interviewees should attend in person except in rare cases (e.g., out-of-state travel).
- Interviewees should be provided a copy of the interview questions to follow along as committee members ask the questions. (Of course, the copy should not leave the room after the interview.) If an interviewee in a rare circumstance (see above) is attending virtually, then each committee member should ask his/her question twice to offset the interviewee not being able to see the questions.
- On the interview note sheet, committee members should write notes only on what the interviewee says. On the interview rating sheet, committee members should write their analytical impressions and evaluations. Please contact the CHRO for sample interview note sheets and rating sheets.
- The interview committee is advisory, with the purpose of identifying strengths and weakness of each interviewee based on the interview answers (and not on any information from outside the interview context). Potentially, some candidates will be stronger than others. All this information is taken by the administrative lead to inform the next stages of the process.

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<sup>1</sup> In the case of a large applicant pool, screening interviews may be considered prior to full committee interviews; in such cases, “internal” candidates would need to be screened, but not necessarily interviewed by the full committee based on performance at the screener.

- All materials should be collected by the administrative lead and submitted to Susana Valenzuela, the Executive Assistant to the CHRO, for retention. The cover sheet that is the final page of this Memo should be attached as the top page of the packet.

**V. Reference Checks & Recommendation to Hire**

- The forms provided in Frontline should be used for this purpose. Please note that, consistent with State statute, GPS Policy 4112.51 indicates:  
*Prior to offering employment to an applicant, the Board shall make a documented good faith effort to contact each current and any former employer that was a Board of Education, council or operator or if such employment otherwise caused the applicant to have contact with children of the applicant in order to obtain information and recommendations which may be relevant to the applicant's fitness for employment, provided such effort shall not be construed to require more than three telephone requests made on three separate days.*
- If the reference checks support moving forward with the Recommendation to Hire, please complete the appropriate form on Frontline with precision as to all information requested. This form is the legal document finalizing the process prior to the applicant's being forwarded to the CHRO.

**VI. Final Hiring**

- Ultimately, a completed Recommendation to Hire is used to invite the finalist in for a final interview with the CHRO, and potential contract discussion/signing. The latter includes verification of the individual's CSDE teacher certification status and transcripts.
- Once a contract is signed, you will be notified, and then can reach out to the new hire for more discussion on details related to the new assignment. Official onboarding (see below) is managed by HR personnel.
- Ultimately, each new hire's contract is contingent upon successful completion of all new hire employment forms provided, verification of employment, and satisfactory confirmed background records checks. These processes are performed by HR personnel, and you will be notified if any issues arise.

Please reach out with any questions you may have.

**GREENWICH PUBLIC SCHOOLS  
APPLICATION MATERIALS RETENTION FORM**

**Name of Position:** \_\_\_\_\_

**Frontline Job #:** \_\_\_\_\_

**Name of Administrative Lead:** \_\_\_\_\_

**Materials Attached** (*please be specific, for example "interview committee question sheets for each candidate from each of the following 6 committee members: . . ."*):

**Date Recommendation to Hire Submitted:** \_\_\_\_\_

**Date Retention Form & Attached Materials Sent to Human Resources:** \_\_\_\_\_

*Please attach this form as the top page of the packet of materials,  
place all materials in secure confidential envelopes,  
and send promptly via inter-office mail to  
Susana Valenzuela in the GPS Human Resources Department.*

*Please do not write below this line.*

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**Date Received by Human Resources / Initials:** \_\_\_\_\_ / \_\_\_\_\_

# EXHIBIT D



# Summary Report – Analysis of Teacher Hiring Decisions for Greenwich Public Schools 2017 - 2022

**Prepared By:**

Clayton Reck, Ph.D., Matthew Thompson, Ph.D.

Date: August 2, 2023

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## 1. Introduction

At the request of counsel for Greenwich Public Schools (“GPS”), Charles River Associates (“CRA”) was asked to review data on applicants and hires from 2017 to 2022. Specifically, we were asked to analyze Teacher postings from 2017 to 2022 to determine whether there were any statistical disparities adverse to older applicants.

### *Summary of Findings*

- We gathered data from GPS and a third-party vendor (Frontline) to analyze teacher hiring events from 2017 to 2022. In total, our analytic database contained information for 11,231 applicants for 732 hiring events.
- We analyzed whether the percent of applicants over age 30 in each teacher posting was similar to the percent of hires in that posting over age 30. Then, we tested whether there were any statistically significant patterns of over or under hiring of individuals over age 30 across postings from 2017 to 2022.
- Overall, we find that across the time period just over nine *more* individuals over age 30 were hired than would be expected given their representation in the applicant pools. This result is not statistically significant, meaning that it could have occurred by chance. We also find no statistically significant differences in the hiring rates of individuals over age 30 by school level (elementary, middle, high school), with small over-selection for elementary and middle school teachers, and a small under-selection for high school teachers.
- When examining the hiring by year we find the annual difference ranges from a shortfall of 4.25 hires to a surplus of 8.52 hires of individuals over 30, with no individual year showing a statistically significant difference.
- All of these results are consistent with a hiring process that is neutral with respect to age.
- The analytical methods used in this study are generally accepted by labor economists examining similar employment outcomes and are commonly used and accepted by courts and other regulatory agencies (e.g., Equal Employment Opportunity Commission (EEOC)).

The following sections outline our background and qualifications, and presents the methodology and results of our analysis.

## 2. Background and Qualifications

### *Clayton Reck, Ph.D.*

Clayton Reck is a Vice President in Charles River Associates’ Labor and Employment practice. Dr. Reck specializes in consulting and expert witness support in labor and employment litigation. He has worked on federal and state wage and hour matters, class action discrimination cases, and single plaintiff cases, in the rebuttal of opposing expert work, damage calculations, and affirmative analyses. Dr. Reck has analyzed issues related

to Title VII, Age Discrimination in Employment Act (ADEA), Fair Labor Standards Act (FLSA), and Office of Federal Contract Compliance Programs (OFCCP) audits of federal contractors. In addition, Dr. Reck has extensive experience in the post-secondary education sector, specifically related to the regulation of for-profit institutions and False Claims Act matters related to higher education. Prior to joining CRA, he was a research economist with ERS Group, spent several years as a graduate student teaching at the University of Illinois at Urbana-Champaign, during which time he received a number of awards for his service, and has served as an adjunct professor in the master's in economics program at Florida State University.

*Matthew Thompson, Ph.D.*

Matthew Thompson, Vice President, is Practice Leader of CRA's Labor and Employment practice. Dr. Thompson specializes in empirical research, applying statistical techniques to the analysis of various issues including firm level employment decisions, government contracting programs, and the impact of proposed regulatory and legislative changes. In these endeavors Dr. Thompson assists clients with the collection, analysis, and production of various electronic and hard copy data sources. He also provides economic loss estimates for single plaintiff and class action cases and assists clients with the development of processes that proactively monitor employment decisions. Dr. Thompson works with attorneys and human resource professionals in analyzing issues concerning Title VII, Age Discrimination in Employment Act (ADEA), Fair Labor Standards Act (FLSA), and Office of Federal Contract Compliance Programs (OFCCP) audits. He has provided expert witness testimony in state and federal cases. In addition to his sole authored work, Dr. Thompson has teamed with leading academic researchers to provide in-depth policy related research. Dr. Thompson has presented employment discrimination issues to attorneys and human resource professionals at seminars on the use of statistics in employment litigation, and has been an invited speaker at North Shore Labor Counsel, New England Legal Foundation, Atlanta Bar Association, Jacksonville Industry Liaison Group, Big Bend SHRM, Professional Liability Underwriting Society, and Jacksonville SHRM events.

### **3. Data Relied Upon**

We rely on two main data sources for our analysis. The first is a list of hires into teaching positions from 2017 through 2022 ("Hires List"). This list was compiled by GPS and contains information about each hire into a teaching position during the time period including name, year of birth, hire date, the school and position for which the individual was hired, the Frontline ID number (explained below), and information about the interviewers making the decision to hire the individual. It is our understanding that this list contains all of the hires into teaching positions at GPS from 2017 through 2022.

The second set of data contains information about applicants and postings for positions at GPS from 2017 through 2022. These data are maintained by a third-party vendor called Frontline, and contain detailed information about applicants applying for postings at GPS.

The data allow us to track information about applicants who applied to particular postings, and contain information about each applicant including education, date of application, work experience, postings applied to (tracked by an identifier called a Frontline ID number), etc. Note that it is our understanding that all individuals who apply to postings at GPS would appear in the Frontline data, but applicants can request to have their data removed after going through the process. The Frontline data that we received would not include information on any applicants who chose to have their data removed from the system.

## 4. Analysis Methodology and Results

In order to analyze whether older applicants (defined for this analysis as those over 30 years of age at the time of their application) were significantly more or less likely to be hired than their younger counterparts, we combined the data from the Hires List and the Frontline data using the following methodology<sup>1</sup>:

- Based on the Hires List, we identified all of the Frontline IDs associated with hires during the time period. Note that Frontline IDs were not available for all hires during the time period. For those missing Frontline IDs, we searched the Frontline application data for the names of the individuals who were hired and identified the Frontline ID of the posting that most closely matched the school, position, and timing of the hiring event to fill in the Frontline ID. We could not determine the Frontline ID for about ten percent of the hiring events on the Hires List and these hiring events were excluded from our analysis.
- Using the Frontline IDs for all of the hiring events we could determine from the Hires List, we extracted information from the Frontline data for all submitted applications to those postings.
- Date of birth (or age at the time of application) is not included in either the Hires List or the Frontline data. Therefore, we must estimate age for each applicant. The Hires List contains year of birth for most hires, which we use to estimate age at the time of hire. The Frontline data contains the highest degree obtained by each applicant as well as the year that degree was obtained. Based on the highest degree obtained we estimate year of birth assuming age at the time of graduation as 18 for high school, 20 for Associate's degree, 22 for Bachelor's degree, and 24 for Master's degree. We then calculate the difference in years between the estimated year of birth and the year of application to estimate age for applicants. The Data Appendix describes several additional steps we took to verify and clean the estimated age for each hire and applicant. Any applicants or hires for whom we could not estimate age were excluded from the analysis. Age could be estimated for over 91 percent of applicants and 99 percent of hiring events.

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<sup>1</sup> Further details of this methodology are provided in the Data Appendix attached to this report.

- This resulted in a database of 11,231 applicants for 732 hiring events.<sup>2</sup>

Once we compiled all of the applicants with known age for each of the postings in our database, we estimated the percent of individuals in each posting who were above 30 years old, as well as the percent of the hires in each posting who were above 30 years old. In an age-neutral process (i.e., a process in which applicants are selected randomly for hire, or at least selected for hire based on factors unrelated to age) one would expect that the percent of individuals hired who are over age 30 to be comparable to the percent of those in the applicant pool who are over age 30. However, each hiring decision was dependent upon the applicant pool available for that particular posting. For example, if the applicant pool only consists of individuals who are under age 30, then it is not possible to hire someone over age 30 from that particular posting, but if half of the applicants in a posting were under age 30 then one would expect half of the hires from that posting also to be under age 30. Therefore, we conduct a statistical analysis of each posting to determine whether the age groups of hires from that posting resemble the age groups of the applicant pool for that posting, and then aggregate those analyses across all postings to test whether a statistically significant pattern exists across the hiring decisions at GPS from 2017 to 2022. Table 1 below presents the results of our analysis of each posting, aggregating the results to school level (Elementary, Middle, High School, Unknown) and across all postings at any school.<sup>3</sup> Table 2 below presents the same analyses reported by year across school levels.<sup>4</sup>

**Table 1 – Analysis of Teacher Hiring Events by School Level  
GPS – 2017 to 2022**

School Level	Total Applicants	Weighted Percent of Applicants Over 30	Total Hires Over 30	Expected Number of Hires Over 30	Difference Between Actual and Expected Hires Over 30	Number of Standard Deviations of the Difference
Elementary School	6,593	58.2%	224	215.84	8.16	0.89
Middle School	1,970	65.8%	108	107.17	0.83	0.06
High School	2,538	62.7%	112	114.03	-2.03	-0.44
Unknown	130	74.1%	14	11.85	2.15	1.10
Across School Levels	11,231	61.3%	458	448.90	9.10	0.73

<sup>2</sup> Note that some postings resulted in more than one individual being hired, and some individuals were hired for more than one posting. We are defining a “hiring event” as an individual hired in a posting so some postings include multiple hiring events, and applicants hired multiple times (for different postings) are included as multiple hiring events. In total, the 732 hiring events were spread across 497 postings.

<sup>3</sup> We have also done the analysis without controlling for posting and instead including all applicants in a single pool and testing whether the percent of applicants over 30 is statistically similar to the percent of hires over 30 and find similar results.

<sup>4</sup> Some postings result in hires in multiple years. For this analysis, we report the year of the first hire observed for each posting.

**Table 2 – Analysis of Teacher Hiring Events by Year  
GPS – 2017 to 2022**

Year	Total Applicants	Weighted Percent of Applicants Over 30	Total Hires Over 30	Expected Number of Hires Over 30	Difference Between Actual and Expected Hires Over 30	Number of Standard Deviations of the Difference
2017	1,997	52.3%	46	45.02	0.98	0.11
2018	2,135	57.9%	64	62.57	1.43	0.20
2019	1,463	63.0%	55	59.25	-4.25	-1.11
2020	1,975	54.9%	86	81.86	4.14	0.66
2021	1,975	67.1%	103	104.73	-1.73	-0.43
2022	1,686	68.7%	104	95.48	8.52	1.67
Across Years	11,231	61.3%	458	448.90	9.10	0.73

Tables 1 and 2 include several calculations. Total applicants is calculated as the total number of applicants across all postings for each school level and across school levels. The weighted percent of applicants over 30 is calculated as the percent of applicants over 30 in each posting weighted by the number of hires in that posting. Total hires over 30 is calculated as the total number of hires of individuals over 30 across all postings for each school level and across school levels. Expected number of hires over 30 is calculated by multiplying the percent of applicants over 30 in each posting times the total number of hires in that posting. The difference between actual and expected hires over 30 reports the total difference between actual and expected hires over 30 across all postings. The number of standard deviations of the difference reports a measure of how likely the calculated difference would have occurred in a random process. Statisticians, social scientists, and the courts typically consider any differences larger than 1.96 standard deviations to be statistically significant (this translates to less than a 5 percent likelihood of occurring by chance).

The analytic method outlined above is generally accepted by labor economists examining similar employment outcomes and are commonly used and accepted by courts and other regulatory agencies (e.g., Equal Employment Opportunity Commission (EEOC)).

Overall, the results in Tables 1 and 2 show a neutral hiring process with respect to age. Across all school levels from 2017 to 2022 just over nine more individuals over age 30 were hired than would be expected based on their representation in the applicant pools. This result is not statistically significant. Within school level, elementary school and middle school hires show small surpluses of hires of individuals over 30, while high school shows a small shortfall of two fewer hires than would be expected based on the representation in the applicant pools. Again, none of these results are statistically significant, meaning that they could have occurred by chance. Similarly, when examining hiring by year we find the annual difference ranges from a shortfall of 4.25 hires to a surplus of 8.52 hires of individuals over 30, with no individual year showing a statistically significant difference. These results are indicative of a hiring process that is neutral with respect to age.

### Data Appendix

1. GPS Hires List
  - The raw data contains 800 rows/hiring events.
  - We condense 4 observations into 2 unique hiring instances. Except for the interviewer names, the information appeared to be duplicative, including the school, job title, and hire date. That brought our total to 798 hiring events.
  - 164 of these 798 hiring events were missing a frontline job posting ID. We manually filled in a frontline job ID for 79 of these 164 hiring events, by looking through all the applications that the individual applied for, and pinpointing the job posting ID that best fit the position, school and hiring time frame of the hiring event. We drop the remaining 85 hiring events that we could not satisfactorily determine a frontline job ID for, leaving us with 713 hiring events.
  - 23 of these 713 hires were listed as being hired for two frontline postings at the same time. We treat these 23 hiring events as 46 unique hiring events, bringing our total to 736 hiring events. Our results are not sensitive to this inclusion.
  - We calculate age as the difference between the hire date and the birth year. Employees could have a birth year but still be missing age if they're missing a hire date.
2. We name-match these 736 hiring events (533 unique names) to the application data to pull all the "appno's" associated with each employee. The Frontline application data tracks applications to postings by "appno" so we must determine which appnos apply to each individual hire. We could not match 1 hiring event (1 unique employee) by name. There were multiple individuals in this posting with the same first name as the individual hired, but none of those had the correct last name, thus this hire was excluded from our analysis.
3. We then use "appno" to match with the "App Job Codes" dataset, to pull all the frontline job IDs associated with that "appno". The "App Job Codes" dataset lists all the frontline posting IDs associated with each "appno" but doesn't list any other identifying applicant information.
4. We estimate age for all the applicants in the application data using education information as proxy, wherever available, using the following assumptions:
  - A 'High School' diploma is attained at 18 years of age;
  - An 'Associate' degree is attained at 20 years of age;
  - A 'Bachelors' degree is attained at 22 years of age;
  - A 'Masters' degree is attained at 24 years of age;We subtract the relevant 'assumption years' from the year that the highest educational degree was attained, to arrive at the applicant estimated birth year.
5. Once we have the dataset of all the frontline job IDs that each of these unique employees applied for, we compare this to the frontline job IDs that they were hired for. We find that 39 hiring instances did not have a corresponding application in the data in the Frontline job ID for which they were hired, so we 'generate' these applications in order to assure that each hire appears in the posting for which they were hired.



This yields a dataset that includes all of the applicants in each of the postings for which we can identify the Frontline job ID of the individual hire.

#### *Review of Age Estimates*

6. We flag and manually review 90 unique employees who fulfill condition A, and either condition B.1 or B.2 below, to pinpoint their correct birth year:

A. The employee's (approximated) birth year in the applications file is different than their birth year in the hires file;

B.1. The different birth years switches the employees "30 or older" and "under 30" categorization in the hires and application data;

B.2. The absolute difference in the birth years is greater than or equal to 4 years.

We look for identifying information in the application data [such as addresses, phone numbers, high school attended] to look up the employee on the internet and fill out their correct birth year. We're able to do so satisfactorily for all 90 unique employees. The hiring file had the correct year for 86 of these 90, while the application file had the correct [approximated] birth year for the remaining 4 employees. Note that for most hires (about 88 percent) the estimated birth year was consistent with the GPS reported birth year.

7. For individuals with multiple applications in the final database, we also review an additional 79 cases who fulfill condition A, and either condition B.1 or B.2 below, to pinpoint their correct birth year.

A. The same employee first and last name in the application file is associated with multiple (missing or non-missing) birth years;

B.1. The different birth years switches the employees "30 or older" and "under 30" categorization;

B.2. There is one missing and one non-missing birth year associated with the same employee first name and last name.

We look for identifying information in the application data [such as addresses, phone numbers, high school attended] to confirm that the employee is, in fact, the same person (and not just different people with the same first/last name) and look up the employee on the internet and fill out their correct birth year. We're able to do so satisfactorily for all 79 cases.

8. After our manual review process, we also attempt to fill out age in the hires and application file for the employees that are present in both files, using the following methods:

- For 24 employees with a missing age in the hires file and a non-missing age in the application file, we use their non-missing application file age for the hiring age counts.
- For 13 employees with a missing age in the application file and a non-missing age in the hires file, we use their non-missing hires file age for the application age counts.

9. In total, we analyze 732 hires and 11,231 applications across 497 frontline IDs.